

December 12, 2025

Dear Acting Director McNally,

I am writing today pursuant to the Mint's December 10 announcement of [final designs](#) for the 2026 semiquincentennial quarters. After examining the design selections shared with the public, it is my belief, in my capacity as a member of the Citizens Coinage Advisory Committee, that a majority of the selections are in violation of the law. I urge you to immediately correct this issue.

The quarters' authorizing statute, [Public Law No. 116-330](#), is clear that “*each of the designs* authorized under this subsection shall be selected by the Secretary *after* consultation with [sic] Commission of Fine Arts and *review by the Citizens Coinage Advisory Committee* [emphasis added].” Nevertheless, the Committee never reviewed, nor was given the opportunity to review, many of the designs, including:

- The Mayflower Compact Obverse and Reverse
- The Revolutionary War Obverse and Reverse
- The Declaration of Independence Obverse
- The U.S. Constitution Obverse
- The Gettysburg Address Obverse and Reverse

Among these designs, there are those which have simply never appeared in front of the committee (such as the Mayflower reverse, which seems to be derived from a coin minted 83 years before the CCAC was formed); those which have different design elements from designs which appeared in previous portfolios (such as the Gettysburg reverse); and those which have different inscriptions from designs which appeared in previous portfolios (such as the Revolutionary War obverse). Public Law No. 116-330 further requires that “at least one of the quarter dollar designs” be “*emblematic of a woman’s or women’s contribution to the birth of the Nation or the Declaration of Independence or any other monumental moments in American history.*” The current set of designs does not include any quarter that clearly satisfies this requirement. The incidental or subordinate depiction of a woman on a coin that is otherwise themed around a ship is not reasonably described as “*emblematic of a woman’s or women’s contribution*” within the meaning of the statute. Furthermore, it is not just the designs which diverged—the themes, too, are wholly different.

On November 3, Mr. Kennedy wrote to the committee in an email that “the law requires proposed coin and medal designs be submitted to the CCAC and CFA and that these bodies be given a reasonable opportunity to review and advise on the proposed designs before a final decision is made by the Secretary.” The Mint’s “opportunity to review” theory is one that finds no support in the statutory text or in past Mint practice, but even if we were to take it as fact, the Mint has *still* failed to live up to its obligations. These proposed coin designs were not submitted to the CCAC or CFA and there was no reasonable opportunity to review and advise on these designs.

This action by the Mint not only violates the text of Public Law No. 116-330, but also diverges sharply from past precedent set by the agency itself. The Mint—and the Secretary of the Treasury—has, for every new coin and medal design since the Committee’s inception, selected only designs which appeared in the specific portfolios presented to the CCAC for a particular series. When the Mint wishes to re-offer an unselected design from a previous portfolio (or a historical coin design pre-dating the CCAC) to the Committee for consideration in a new series, it always places that old design into a new portfolio. When there are multiple options for inscriptions around a central design element, or there are variations in the central design element itself, they are typically demarcated as distinct designs within and across portfolios for separate consideration; substantive inscription and design changes undeniably constitute new designs.

As a result of the decision to select these designs, my statutorily-designated role to review has been bypassed. This constitutes an agency action unlawfully withheld, without observance of procedure required by law, and pursued in an arbitrary and capricious manner. Furthermore, if a member of this Committee believes the statutory review requirement was not satisfied before a design was approved, there is no apparent formal internal mechanism within the Mint or Treasury to raise that concern or request reconsideration. Together, these circumstances potentially expose the Mint to liability along statutes other than Public Law No. 116-330.

Accordingly, I respectfully request that the Mint and the Secretary immediately suspend and withdraw approval of any 2026 semiquincentennial quarter designs that have not been submitted to the CCAC for review and to the CFA for consultation, and that you take one of the following corrective steps:

1. Select semiquincentennial quarter designs which were already reviewed by the committee for a semiquincentennial quarter portfolio

2. Submit new portfolios to the CCAC for its review and the CFA for its consultation, if they are willing to review and consult, respectively, on those portfolios
3. Do not issue five different semiquincentennial quarter designs; only mint those which the CCAC has reviewed and which the Secretary and the Mint find acceptable

Because these issues bear directly on statutory compliance and the validity of the final design selections, please provide a response to the following questions by Friday, December 19.

1. How does the Mint interpret the statutory requirement that each design be selected only after CCAC “review,” and what is the Mint’s understanding of how that requirement applies to the designs listed above? Please identify any internal guidance, legal interpretations, or precedents the Mint relies upon for this interpretation.
2. Please identify and provide any written Mint or Treasury guidance addressing situations in which the Secretary selects a design that the CCAC has not reviewed.
3. What does the Mint consider to be the final step in the design approval process for coins and medals, and at what point does the Mint regard the design selection decision as complete?
4. If the Committee never has the opportunity to review specific designs, how are individual members supposed to fulfill their statutory review responsibilities?
5. How does the Mint interpret the statutory requirement that at least one design in the semiquincentennial series be “emblematic of a woman’s or women’s contribution...”? In the Mint’s view, what characteristics must a design have to satisfy that requirement?
6. If the Secretary selects a design for a particular coin or medal authorized by law which requires the Committee’s review but which has not, in fact, been reviewed by the CCAC, what, in the Mint’s view, is the appropriate process for addressing that injury?
7. Is there any formal internal mechanism within the Mint or Treasury through which a CCAC member may raise concerns that the statutory review requirement was not satisfied or request reconsideration of a design-selection decision?
8. For each of the designs listed above, on what date did the Mint or the Secretary approve the final design?
9. For each design, in which portfolio(s), if any, does the Mint believe that design was presented to the CCAC?

10. What criteria does the Mint use to determine whether a change in inscriptions, theme, or other design elements constitutes a new design requiring CCAC review?
11. Which Mint officials or offices were responsible for determining that the unreviewed designs met the statute's review and consultation requirements?

Thank you,

Kellen Hoard